

National Pork Board

P.O. Box 9114 Des Moines, Iowa 50306 USA Phone: 515-223-2600 Fax: 515-223-2646



July 5, 2005

National Animal Identification System (NAIS) Draft Strategic Plan 2005 to 2009 and Draft Program Standards April 25, 2005

Docket No. 05-015-1

Federal Register May 6, 2005

Introduction

These remarks are submitted on behalf of the National Pork Board in response to APHIS' request for comments on the Federal Register Docket No. 05-015-1 National Animal Identification System (NAIS) Draft Strategic Plan 2005 to 2009 and Draft Program Standards April 25, 2005. The National Pork Board was established by an act of Congress in 1985 and is responsible for the collection, distribution, and program accountability for the money generated by the pork Checkoff. A Board led by 15 pork producers creates programs in the areas of promotion, research, and consumer information. These programs support producers by providing them with information on many areas including swine health. The information contained in this communication is intended to provide information on animal identification in the pork industry.

The National Pork Board has been one of the participants in the Pork Industry Identification Working Group, which was formed under the direction of the USDA's National identification Steering Committee. As an active participant, we helped author the draft identification standards for the pork industry for USDA's consideration of insertion into NAIS.

The Checkoff Swine Health Committee directs the pork industry's swine health research and programming and the prevention of the introduction of foreign animal diseases as a high priority in both these activities. Foot and Mouth Disease (FMD) can infect all cloven hoofed animals. Because of this, effective and mandatory identification of all premises of all relevant species is essential to enable animal health officials to rapidly track and contain foreign animal disease should it be introduced in the country.

Reports in the national press of animal welfare activists attacking animal agriculture facilities have underscored certain risks to producer operations. Confidentiality of the premise and animal movement data that will become part of the NAIS is essential to guaranteeing the success of a mandatory animal identification program.

Pork producers routinely record production information including animal movements. These records include animal identification and could be used by animal health officials to support the goal of a 48 hour traceback in the event of an animal health emergency.

Currently a Certificate of Veterinary Inspection is required for all interstate movement of animals. This system is effective in providing a way to record and track animal movements. Converting the system to one of electronic recording and transfer would enable its use for animal

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health tracking purposes without unnecessary intrusion into the daily responsibilities of pork producers. Electronic recording and transfer would also support accessing the data in a timely fashion and assist in the 48 hour traceback goal. Security of the database, its compatibility with the needs and capabilities of all states, and its accessibility to federal animal health officials are important factors.

Intrastate movement recording and reporting is now an issue handled at the state level. Additional research on cost-effective recording and reporting mechanisms is needed to better understand the implications of having a mandatory intrastate movement system. Buyer/receiver reporting of the intrastate movement is one of the issues that could be included in a mandatory intrastate movement program.

Our experience and research in animal health monitoring shows that compliance with record keeping and reporting could be audited and enforced by animal health officials via personal site visits on a statistically valid percentage of premises. State and federal animal health officials should have the flexibility to examine farm or market records for cause as well as part of a random audit.

A high research and programming priority for pork producers is the prevention of foreign animal disease introduction. Checkoff has supported research to help learn from the lessons of those countries that have FMD and other foreign animal diseases. The U.S. needs to be quickly prepared with effective premise and animal identification systems in order to protect the national herd from the devastation of a disease crisis. Based on these experiences, it is important that resources are identified in a timely manner to enable all livestock premises to be registered and a mandatory animal identification system to be in place.

The National Pork Board looks forward to continuing to work with the Pork Industry Identification Working Group and other committees to help further animal identification needs in ways that are credible, workable and affordable. If you have further questions or would like further information on any of the pork industry's animal and premise identification programs, please contact Dr. Robyn Fleck, Director of Swine Health Programs for the National Pork Board.

Sincerely,

A handwritten signature in black ink that reads "Paul Sundberg DVM". The signature is written in a cursive, flowing style.

Paul Sundberg, DVM, PhD
Vice President, Science and Technology
National Pork Board